

**EXHIBIT 13**

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**From:** Knudson, Jacquelyn Swanner  
**Sent:** Thursday, January 7, 2021 3:56 PM  
**To:** donald@creadorelawfirm.com  
**Cc:** McClammy, James I.; Scott R. Bickford; Kent Harrison Robbins - KHR Law Offices  
**Subject:** RE: PURDUE PHARMA 19-cv-23649 NASAHC REQUEST TO MEET AND CONFER

Don—

Thank you for reaching out, and happy New Year.

We are happy to have a call in advance of your review of the documents, if helpful. However, it may be more productive to have a call after you have completed your review of the documents. After your review of the documents, we can discuss how best to update the court.

We are available tomorrow at 2:45 p.m. if you want to discuss in advance of your review of the documents or to discuss the additional topic you raise regarding discount card data.

Best,  
Jacquelyn

**Jacquelyn Swanner Knudson**

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**From:** donald@creadorelawfirm.com <donald@creadorelawfirm.com>  
**Sent:** Thursday, January 7, 2021 3:34 PM  
**To:** Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; McClammy, James I. <james.mcclammy@davispolk.com>  
**Cc:** Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>; McClammy, James I. <james.mcclammy@davispolk.com>; Scott R. Bickford <srb@mbfirm.com>; Kent Harrison Robbins - KHR Law Offices <khrlawoffices.com>; don creadore <Donald@creadorelawfirm.com>  
**Subject:** RE: PURDUE PHARMA 19-cv-23649 NASAHC REQUEST TO MEET AND CONFER

Jacquelyn, Jim-

In addition to the need to meet and confer regarding issues surrounding the scientific information and the results of the UCC issued only earlier this week, the NASAHC also proposes a meet and confer on the subject of **discount card data**, as such information relates to birth mothers of children injured by prenatal opioid exposure and those diagnosed with NAS. This is another asset that undoubtedly favors and benefits creditors, including but not limited to NAS Claimants. Equally important, the unlocking of this asset (i.e., the data) will directly inure to the benefit of creditors in that it will enable claimants to satisfy the requirements of the Personal Injury Proof of Claim Form.

Also please consider this a renewal of our request to have your thoughts regarding availability to meet and confer on Friday at 2:30 p.m., as we had proposed yesterday.

May we please have your thoughts?

Many thanks,

Don

-----Original Message-----

From: "[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)" <[donald@creadorelawfirm.com](mailto:donald@creadorelawfirm.com)>

Sent: Wednesday, January 6, 2021 3:31pm

To: "Knudson, Jacquelyn Swanner" <[jacquelyn.swanner@davispolk.com](mailto:jacquelyn.swanner@davispolk.com)>, "McClammy, James I." <[james.mcclammy@davispolk.com](mailto:james.mcclammy@davispolk.com)>

Cc: "don creadore" <[Donald@creadorelawfirm.com](mailto:Donald@creadorelawfirm.com)>, "Scott R. Bickford" <[srb@mbfirm.com](mailto:srb@mbfirm.com)>, "Kent Harrison Robbins - KHR Law Offices" <[khr@khrlawoffices.com](mailto:khr@khrlawoffices.com)>

Subject: PURDUE PHARMA 19-cv-23649

NASAHC

Hello Jacquelyn-

Hope the new year finds you well.

I wanted to advise DPW that two days ago, on Monday afternoon (1/4/21), the UCC provided the NASAHC with a report of the results of the search terms performed for (1) the Sackler-produced documents (including from NRF on behalf of the Sacklers and IACs), and (2) the Debtor-produced documents (including documents produced in these cases, as well as copies of productions that were made in pre-petition litigation).

The UCC transmittal communication observed that the volumes of results is very large, especially with respect to the Debtors. The UCC results are currently under review by us.

As a friendly reminder, Debtors' last communication with the court had advised that a meet and confer would transpire upon notification of the search results from the UCC; this event has now occurred.

What are your thoughts regarding:

(1) scheduling a meet and confer this week regarding the status of the UCC search results; our team is proposing Friday (1/8) at 2:30p est?

as well as

(2) circling back with the court with a status report to be filed (if you prefer jointly) *prior* to the January 2021 Omnibus Hearing?

May we please have your thoughts?

Many thanks,

Don

o/b/o Purdue NAS Children Ad Hoc

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